

In violation of Title 18, United States Code, Section 1366(a).

COUNT 2

THE UNITED STATES ATTORNEY CHARGES:

In or about April 2024, in the District of South Carolina, the Defendant, DONALD RAY HURST JR., did knowingly possess material that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor, and which had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and which were produced using materials that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer, in that he did possess a Seagate hard drive, serial number 5RN0BYHE, on which were stored visual depictions of persons under the age of eighteen engaging in sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2).

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

## **FORFEITURE**

### **DESTRUCTION OF AN ENERGY FACILITY:**

Upon conviction for violation of Title 18, United States Code, Section 1366 as charged in this Information, the Defendant, **DONALD RAY HURST JR.**, shall forfeit to the United States any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offenses, and any property, real or personal, which constitutes, is traceable, or is derived from any proceeds the Defendant obtained, directly or indirectly, as the result of such violation.

### **CHILD PORNOGRAPHY:**

Upon conviction for violation of Title 18, United States Code, Section 2252A, as charged in this Information, the Defendant **DONALD RAY HURST JR.**, shall forfeit to the United States his interest in:

- i. any visual depiction described in section 2251, 2251A, or 2252, 2252A of chapter 110 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of chapter 110 of the United States Code;
- ii. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and
- iii. any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses.

### **PROPERTY:**

Pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C) and 981(a)(1)(G), 2253, and Title 28, United States Code, Section 2461(c), the property which is

subject to forfeiture upon conviction of the Defendant for the offenses charged in this Information includes, but is not limited to, the following:

A. Firearms:

- (1) Taurus Model PT 92, 9mm pistol  
Serial Number: TEX47387  
Asset ID: 24-FBI-003962
- (2) Walther, Model P22, .22 caliber pistol  
Serial Number: Z044967  
Asset ID: 24-FBI-003962

B. Cash Proceeds / Forfeiture Judgment:

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offenses charged in this information, and all interest and proceeds traceable thereto, and/or that such sum equals all property derived from or traceable to his violations of 18 U.S.C. §§ 1366 and 2252A.

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant-

- A. Cannot be located upon the exercise of due diligence;
- B. Has been transferred or sold to, or deposited with, a third person;
- C. Has been placed beyond the jurisdiction of the court;
- D. Has been substantially diminished in value; or
- E. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendants up to the value of the forfeitable property.

Pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C) and 981(a)(1)(G), and Title 28, United States Code, Section 2461(c).

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

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